

AB:JOE
F. #2022R00352

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

SELWYN BALKISSOON,

Defendant.

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TO BE FILED UNDER SEAL

**AFFIDAVIT AND COMPLAINT IN
SUPPORT OF AN APPLICATION FOR
ARREST WARRANT**

(18 U.S.C. § 1951(a))

22-MJ- 453

EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER HARPER, being duly sworn, deposes, and states that he is a Special Agent with the Federal Bureau of Investigation (“FBI”), duly appointed according to law and acting as such.

In or about and between March 30, 2022 and April 20, 2022, both dates being approximate and inclusive, within the Eastern District of New York, the defendant SELWYN BALKISSOON, together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of United States currency from an armored truck at Resorts World New York City in Jamaica, Queens, New York (“Resorts World”).

(Title 18, United States Code, Section 1951(a))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the FBI and have been since 2018. In that capacity, I have investigated various federal crimes, including Hobbs Act robberies, related firearms cases, and other violent offenses. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, and from reports of other law enforcement officers involved in the investigation.

2. On or about March 30, 2022, a confidential informant (the "CI") informed the FBI that he/she had met the defendant SELWYN BALKISSOON, who is employed as a security guard at Resorts World, a hotel and casino, and that BALKISSOON had proposed their robbing an armored truck that transports U.S. currency to and from Resorts World.²

3. On or about April 8, 2022, BALKISSOON placed a call to the CI that the CI consensually recorded. During that call, BALKISSOON explained to the CI, in substance, how easy it would be to rob an armored truck at Resorts World. BALKISSOON told the CI, among other things, "Look how easy it is, if you pull up next to him. He don't even know that you pull up next to him. You pull that door, you blast his ass, and within 30 seconds time you take 8 or 10 of them bags." Based on my experience and training, I understand

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

² In the past and with the respect to this matter, the CI has been and will be compensated for the credible information that he or she provides law enforcement. The information that the CI has provided law enforcement in this matter has been corroborated by, among other things, the consensually recorded conversations and other surveillance evidence referenced herein.

BALKISSOON's reference to "bags" to be a reference to bags of U.S. currency transported in the armored truck.

4. In the same recorded call, BALKISSOON suggested to the CI that the CI recruit another individual to help conduct the armed robbery, and proposed that BALKISSOON would drive the CI and the other individual around the Resorts World property to show them how they could rob the armored truck without being detected and then successfully flee the scene. Among other things, BALKISSOON told the CI: "We gonna take one more drive through. Bring your boy, the two of you sit in the back and I will show you You know, they are all fucking sitting ducks. They're lame fucking guys, they're just there for the money and they don't give a fuck who take what and gone with it."

5. In the same recorded call, BALKISSOON told the CI the following: "And all you need is minutes—open that door, spray his ass . . . slam . . . to the ground and boom, when you pull up with your trunk open one time, boom boom boom, back up, take the fuck off. If you want, go down the conduit, you know the conduit? . . . Take the Belt Parkway and just fucking disappear."

6. On or about April 13, 2022, BALKISSOON and the CI agreed in a call that they, together with a third individual to be recruited by the CI, would in fact surveil the Resorts World property by car on April 14, 2022.

7. On or about April 14, 2022, the CI and an undercover law enforcement agent ("UC") picked up BALKISSOON by car at his home in Queens, New York and drove to the Resorts World property. The CI and UC recorded their conversation with BALKISSOON as they drove around the Resorts World property. BALKISSOON first explained that there were no cameras where the armored truck arrived at the property: "Now when the truck

come . . . there's no cameras over here. That one is facing the door [BALKISSOON is pointing], and that one is facing down in there . . . you chill right here, nobody will bother you, you know? . . . The truck will pull up right there." BALKISSOON then explained: "That's not casino money—that's outside money . . . 260 per bag, they have over 20 bag[s]." Based on my training and experience, and after speaking with the CI and UC, I understand BALKISSOON's reference to "260 per bag" and "20 bag[s]" to mean that the armored truck would be carrying 20 bags each containing \$260,000 in U.S. currency.

8. In the same recorded conversation, BALKISSOON next proposed the best getaway route: "That is the safest route when it comes to not being followed . . . past the conduit, or you go across the bridge." BALKISSOON then suggested recruiting another individual so that the group could rob more money: "I wanna say get a third fucking guy. But you don't want loose lips sinking ships." BALKISSOON went on to explain what he would do if armed security guards at Resorts World tried to pull their firearms on the group: "If I'm here it's a done fucking deal. I'll say brother, put that fucking gun down." BALKISSOON then proposed assaulting and/or using a weapon against the armed security guards in connection with the planned robbery: "You don't need bear spray. You have a good fucking punch, one fucking right. Or get a fucking BB gun, it don't make a fucking difference. I got a rifle home . . . they're so safe at this place, you know that, the fear of being robbed is out of the fucking way." Finally, BALKISSOON explained how easy it would be to pull off the planned robbery: "Look at me every carefully—this is 99-100 percent doable. In/out than no more than fucking twenty seconds. Slam bam thank you ma'am . . . get five bags."

9. On or about April 20, 2022, the CI consensually recorded another call with BALKISSOON in which BALKISSOON agreed that the CI and UC would conduct the robbery of the armored trucks at Resorts World on the morning of April 21, 2022 and share a portion of the proceeds of the stolen currency with BALKISSOON.

10. On the same call, BALKISSOON explained, in substance, that he would procure pepper spray for the CI and UC to use in connection with the planned April 21, 2022 robbery.

11. On the evening of April 20, 2022, the CI drove to BALKISSOON's Queens, New York home, where BALKISSOON entered the CI's car and handed him the promised pepper spray to use in connection with the planned April 21, 2022 robbery.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued so that the defendant SELWYN BALKISSOON may be dealt with according to law.

WHEREFORE, in addition, it is respectfully requested that this affidavit and the requested arrest warrant remain under seal until the defendant is arrested in order to prevent the defendant's flight and the safety of the CI.

/s/ Christopher Harper
CHRISTOPHER HARPER
Special Agent
Federal Bureau of Investigation

Sworn to before me by telephone this
21 day of April, 2022

Lois Bloom
THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK